

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:23-cv-23004-WPD

JANE DOE, a minor, by and through  
her mother and next friend, Mother  
Doe,

Plaintiff,

vs.

ACADEMIR CHARTER SCHOOLS,  
INC.,  
SUPERIOR CHARTER SCHOOL  
SERVICES, INC.

Defendants.

/

**DEFENDANT'S INITIAL DISCLOSURES**

Defendant SUPERIOR CHARTER SCHOOL SERVICES, INC., submits  
its Initial Disclosures as follows:

**I. The name and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

1. Jane Doe  
c/o Derek Smith Law Group, PLLC  
520 Brickell Key Drive, Suite O-301  
Miami, FL 33131

Jane Doe is the Plaintiff in this lawsuit and has knowledge of the information alleged in the Complaint.

2. Mother Doe and Father Doe  
c/o Derek Smith Law Group, PLLC  
520 Brickell Key Drive, Suite O-301  
Miami, FL 33131

Mother Doe and Father Doe have knowledge regarding the information alleged in the Complaint.

3. L.R. and L.R.'s Parents or Legal Guardians  
Address is unknown at this time.

L.R. and his parents or legal guardians likely have knowledge regarding Plaintiff's allegations made in the Complaint and any actions taken by Defendants in response to Plaintiff's claims.

4. Rolando Mir  
c/o Garrison, Yount, Forte & Mulcahy, LLC  
601 Bayshore Blvd., Suite 800  
Tampa, FL 33606  
(813) 275-0404

Rolando Mir has knowledge regarding the information alleged in the Complaint. Specifically, Rolando Mir may have knowledge regarding the Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants in response to Plaintiff's claims.

5. Melissa Valladares  
c/o Garrison, Yount, Forte & Mulcahy, LLC  
601 Bayshore Blvd., Suite 800  
Tampa, FL 33606  
(813) 275-0404

Melissa Valladares has knowledge regarding the information alleged in the Complaint. Specifically, Melissa Valladares may have knowledge regarding the Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants in response to Plaintiff's claims.

6. Zoey Castellon  
c/o Garrison, Yount, Forte & Mulcahy, LLC  
601 Bayshore Blvd., Suite 800  
Tampa, FL 33606  
(813) 275-0404

Zoey Castellon has knowledge regarding the information alleged in the Complaint. Specifically, Zoey Castellon may have knowledge regarding the Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants in response to Plaintiff's claims.

7. Hira Chaudry  
c/o Garrison, Yount, Forte & Mulcahy, LLC  
601 Bayshore Blvd., Suite 800  
Tampa, FL 33606  
(813) 275-0404

Hira Chaudry has knowledge regarding the information alleged in the Complaint. Specifically, Hira Chaudry may have knowledge regarding the Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants in response to Plaintiff's claims.

8. Stephanie Ruiz  
c/o Garrison, Yount, Forte & Mulcahy, LLC  
601 Bayshore Blvd., Suite 800  
Tampa, FL 33606  
(813) 275-0404

Stephanie Ruiz has knowledge regarding the information alleged in the Complaint. Specifically, Stephanie Ruiz may have knowledge regarding the Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants in response to Plaintiff's claims.

9. Suise Bello  
c/o Garrison, Yount, Forte & Mulcahy, LLC  
601 Bayshore Blvd., Suite 800  
Tampa, FL 33606

(813) 275-0404

Suise Bello has knowledge regarding the information alleged in the Complaint. Specifically, Suise Bello may have knowledge regarding the Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants in response to Plaintiff's claims.

10. Miami-Dade Police Department  
Office N. Almaguer, Badge No. 10193  
9105 NW 25th Street  
Doral, FL 33172

The Miami Dade Police Department likely has knowledge and information regarding a report made by Mother Doe on or around January 25, 2023.

11. Defendant reserves the right to supplement this response consistent with the provisions of Fed. R. Civ. P. 26(a)(1) and/or the Court's Scheduling Order.

**II. A copy of, or a description by category and location of all documents, data, compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

The following documents/ photographs are in possession and control of Defendant's counsel:

1. The Miami-Dade School Board's Code of Student Conduct.
2. Miami-Dade Police Department's Offense-Incident Report and Contact/Case Report.
3. AcadeMir Charter Schools Employee Handbook.
4. AcadeMir's Student Case Management Students Services Forms.

5. Amended Charter School Management Agreement between Academir Charter School West and Superior Charter School Services, Inc.
6. Six surveillance video tapes depicting Jane Doe's classroom on January 20, 2023.
7. One surveillance video tape depicting Mother Doe and Father Doe's meeting with AcadeMir staff on January 24, 2023.
8. One surveillance video tape depicting Father Doe's meetings with Academir Staff on January 25, 2023.

Defendant reserves the right to supplement this response consistent with the provisions of Fed. R. Civ. P. 26(a)(1) as discovery remains ongoing.

**III. A computation of any category of damages claimed by the disclosing party making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

Defendant has not made a claim for damages against Plaintiff at this time. However, Defendant reserves the right to seek certain claims based upon litigation of this case (i.e., attorney's fees and costs as provided by statute) to the extent recoverable by law.

**IV. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgement which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Defendant's policy will be produced in response to Plaintiff's discovery requests.

Dated: November 16, 2023.

Respectfully submitted,

s/ Scott P. Yount

Scott P. Yount, FBN: 0021352  
Garrison, Yount, Forte & Mulcahy, L.L.C.  
601 Bayshore Blvd., Suite 800  
Tampa, Florida 33606  
Phone: 813-275-0404  
Fax: 813-275-0304  
Attorney for Superior Charter School  
Services, Inc.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on November 16, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of Court via the CM/ECF which will serve the parties by email on the service list below.

s/ Scott P. Yount

Scott P. Yount, FBN: 0021352  
Garrison, Yount, Forte & Mulcahy, L.L.C.  
601 Bayshore Blvd., Suite 800  
Tampa, Florida 33606  
Phone: 813-275-0404  
Fax: 813-275-0304  
Attorney for Superior Charter School  
Services, Inc.

**SERVICE LIST**

Christopher T. Lawson, Esq.  
Florida Bar No.: 1025196  
Julie B. Karron, Esq.  
Florida Bar No.: 14683  
Freeman, Mathis & Gary, LLP  
2502 N. Rocky Point Dr., Suite 550  
Tampa, Florida 33607  
Tel: (813) 774-6363  
julie.karron@fmglaw.com  
chris.lawson@fmglaw.com  
Counsel for Defendant Academir

Kyle T. MacDonald, Esq.  
Florida Bar No.: 1038749  
Derek Smith Law Group, PLLC  
701 Brickell Ave, Suite 1310  
Miami, FL 33131  
Tel: (305) 946-1884  
Fax: (305) 503-6741  
Kyle@dereksmithlaw.com  
*Counsel for Plaintiff*